

FILED IN THE
U.S. DISTRICT COURT
EASTERN DISTRICT OF WASHINGTON

AUSA Assigned: TJO

Jun 27, 2024

County of Investigation: Spokane

SEAN F. MCVOY, CLERK

*In Re: Criminal Complaint for OSVALDO GUADALUPE SOTO-ORDUNO,
JOSE ROMAN LIZARRAGA GERARDO AND
JOSE EFRAIN GONZALEZ RODRIGUEZ*

AFFIDAVIT

STATE OF WASHINGTON)
)
) ss
Spokane County)

AFFIDAVIT IN SUPPORT

I, Joshua Nations, being first duly sworn, hereby depose and state as follows:

TRAINING AND EXPERIENCE

1. I am a Border Patrol Agent – Intelligence with the Department of Homeland Security, Customs and Border Protection (“CBP”), United States Border Patrol, Spokane Sector Intelligence Unit. Since October 2023, I have been assigned as a Task Force Agent (“TFA”) with the Drug Enforcement Administration (“DEA”), assigned to the Spokane Regional Anti-Violence Enforcement and Narcotics (“RAVEN”) Task Force, a multi-agency task force in Spokane, Washington. Prior to that, since February 2018, I was assigned as a TFA to the Federal Bureau of Investigation (“FBI”) in Spokane, Washington. As a Border Patrol Agent and TFA, I am authorized to investigate violations of laws of the United States and am a law enforcement officer with the authority to execute

warrants issued under the authority of the United States. I have been employed by the Border Patrol since September 2005. I successfully completed the Border Patrol Academy and the Federal Law Enforcement Training Center Basic Law Enforcement Academy in Artesia, New Mexico. I have received training regarding various aspects of law enforcement including, but not limited to, federal criminal investigations, narcotics crimes, evidence collection, crime scene processing, search and seizure, and warrant applications.

2. Additionally, I have participated in criminal investigations involving drug trafficking. This participation includes acting as the case agent, working within a task force with other federal TFOs and assisting other law enforcement agencies. Through this participation, I have gained an understanding of the manner in which controlled substances are manufactured, and/or distributed, and the various roles members of such organizations serve in furtherance of the organization's drug trafficking and money laundering activities.

FACTS IN SUPPORT OF COMPLAINT

3. As part of an ongoing DEA investigation, a Toyota Corolla with California license plate 9LUD766 was identified as a vehicle believed to be utilized to transport controlled substances to the Eastern District of Washington. On June 26, 2024, law enforcement observed that vehicle traveling eastbound on I-90 approaching Spokane, and followed the vehicle to a residence in Spokane. Law

enforcement saw Jose Roman LIZARRAGA-Gerardo (driver) and Osvaldo Guadalupe SOTO-Orduno (passenger) exit the Toyota and enter the residence. SOTO was observed carrying a black bag into the residence.

4. Law enforcement later observed LIZARRAGA and SOTO exit the residence and depart in the Toyota. SOTO was observed carrying a black bag to the Toyota.

5. A vehicle stop was conducted of the Toyota. The driver (SOTO) verbally consented to a search of the vehicle. During that search a Border Patrol K9 trained to detect the odors of controlled substances alerted to locations in the vehicle, including to a black bag found to contain several large bundles of US currency packaged in a manner which officers recognized as consistent with large scale drug trafficking.

6. Law enforcement later observed James Clinton TRINNEER (driver) and Jose Efrain GONZALEZ-Rodriguez (passenger) exit the residence and depart in an Acura sedan. GONZALEZ-Rodriguez was seen carrying a backpack from the residence into the Acura. A vehicle stop was conducted on the Acura and TRINNEER and GONZALEZ were detained.

7. A search of the residence pursuant to federal search warrant resulted in the seizure of controlled substances, including approximately 61,000 (estimated due to weight and manner of packaging) round blue pills stamped with "M" and "30"

(consistent in appearance with counterfeit pills containing fentanyl as commonly encountered by law enforcement); approximately 1464.2 grams (packaged weight) of a crystal substance a sample of which field tested positive for methamphetamine; approximately 590.3 grams (packaged weight) of a white powder a sample of which field tested positive for cocaine; approximately 176.1 grams (packaged weight) of a brown substance which field tested positive for heroin; four firearms.

8. A search of the Acura sedan pursuant to federal search warrant resulted in the seizure of an additional approximately 7,000 presumed fentanyl pills, and approximately two pounds of presumed methamphetamine, which were located in the black backpack carried by GONZALEZ.

CONCLUSION

9. Based upon the above facts, I believe probable cause exists to charge Osvaldo Guadalupe SOTO-Orduno, Jose Roman LIZARRAGA-Gerardo and Jose Efrain GONZALEZ-Rodriguez with Conspiracy to Distribute 400 Grams or More of a Mixture Containing Fentanyl and 500 Grams of More of a Mixture Containing Methamphetamine, in violation of 21 U.S.C. §§ 841(a)(1), (b)(1)(A)(vi),(viii), 846.

//

//

//

I declare under penalty of perjury that the statements above are true and correct to the best of my knowledge and belief.

Respectfully Submitted,



Joshua Nations
Drug Enforcement Administration

Subscribed electronically and sworn to telephonically this 27th day of June, 2024.





James A. Goeke
United States Magistrate Judge